

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**VS.**

**CASE NO.: 3:20-cr-00037-TSL-FKB**

**CERISSA RENFROE NEAL**

**DEFENDANT**

**CERISSA NEAL’S UNOPPOSED MOTION FOR A  
DECLARATION OF INDIGENCY AND FOR THE APPOINTMENT OF COUNSEL**

**COMES NOW**, Cerissa Renfroe Neal’s (hereinafter “Neal”) Unopposed Motion for a Declaration of Indigency and for the appointment of counsel, and in support thereof, would show unto the Court the following, to-wit:

1. Cerissa Neal appeared before this Court on August 18, 2020 and entered a plea of not guilty to a multi-count indictment for conspiracy to commit mail fraud, wire fraud, engaging in monetary transactions and bribery involving federal programs.
2. Undersigned counsel appeared as counsel with Neal at her initial appearance as Neal had agreed to pay undersigned counsel to represent her in this matter. During Neal’s appearance, she was interviewed by the United States Probation Office which found to have a negative net worth of \$73,773.00. *See*, Exhibit A, email from Brooke Sullivan.
3. Undersigned counsel received Cerissa Neal’s discovery on August 24, 2020 and working with Neal in anticipation of a September 28, 2020 trial date. *See*, Exhibit B, email from undersigned counsel to Ted Cooperstein. On or about September 10, 2020, three other defendants charged in the indictment appeared before this Court and like Neal, those defendants entered pleas of not guilty. The Federal Defender’s Office was appointed to represent Lambert Martin.
4. Despite her best efforts, Neal, who is now unemployed and a single mother with three

minor children, has been unable to secure funds to pay undersigned counsel to continue to represent her in this matter. Because undersigned counsel has poured through the discovery and is well acquainted with this case, and at the request of Neal, undersigned counsel desires to continue to represent Neal and to have the government to pay Neal's legal fees.

5. Undersigned counsel is a member of the Criminal Justice Act panel in the Southern District of Mississippi. The Federal Defender's Office has a conflict and is unable to represent Neal as the office is representing Lambert Martin.

6. Undersigned counsel has conferred with the Assistant United States Attorney Ted Cooperstein about her intent to ask this Court to declare Neal indigent and to allow undersigned counsel to continue to represent her in this action. The United States Attorney's Office does not object.

7. Undersigned counsel also has conferred with Federal Defender Omodare Jupiter about the instant motion. The Federal Defender's Office does not have a position on the instant motion.

8. Due to the straightforward nature of this motion and because there is no objection from the government, undersigned counsel requests this Court to relieve her of any obligation to file a memorandum in support of her motion.

**WHEREFORE PREMISES CONSIDERED**, Neal prays that after reviewing this motion hearing, this Court will enter an Order declaring her indigent, permitting undersigned counsel to continue to represent her and permitting undersigned counsel to be compensated under the Criminal Justice Act.

**RESPECTFULLY SUBMITTED** this the 25<sup>th</sup> of September 2020.

/s/ Lisa M. Ross  
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**CERTIFICATE OF SERVICE**

I, Lisa M. Ross, the attorney for Cerissa Neal, hereby certify that on the 25<sup>th</sup> day of September, 2020, I electronically filed the foregoing with the Clerk of the Court using ECF system which sent notification of such filing to all parties of record to the electronic mail address on file with the clerk.

/s/ Lisa M. Ross  
Lisa M. Ross